

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ASHLEY PIERRELOUIS, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

GOGO INC., MICHAEL J. SMALL,
OAKLEIGH THORNE, NORMAN SMAGLEY,
BARRY ROWAN, and JOHN WADE,

Defendants.

No. 1:18-cv-04473

CLASS ACTION

Honorable Jorge L. Alonso

**MOTION OF MARIA ZINGAS FOR APPOINTMENT AS LEAD PLAINTIFF AND
APPROVAL OF SELECTION OF COUNSEL**

Movant Maria Zingas (“Movant”), by and through her counsel, respectfully moves this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. §78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), for an Order (attached hereto): (i) appointing Movant as Lead Plaintiff on behalf of all persons that purchased or otherwise acquired Gogo Inc. (“Gogo” or the “Company”) securities during the Class Period; (ii) approving Movant’s selection of counsel as Lead Counsel and Liaison Counsel; and (iii) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Movant attaches hereto: a Memorandum of Law (Exhibit A), the Declaration of Peter S. Lubin (Exhibit B) and exhibits attached thereto, the pleadings, and other filings herein and such other written or oral arguments as may be presented to the Court.

This motion is made on the grounds that Movant is the most adequate plaintiff, as defined by the PSLRA, based on her losses of approximately \$91,421.46 which was suffered as a result of Defendants' wrongful conduct as alleged in the above-referenced actions. Further, Movant satisfies the requirements of Rule 23(a) of the Federal Rules of Civil Procedure, as her claims are typical of other Class members' claims and she will fairly and adequately represent the interests of the class.

Dated: August 27, 2018

Respectfully submitted,

/s/ Peter S. Lubin

Peter S. Lubin
Vincent L. DiTommaso
Patrick D. Austermuehle
James V. DiTommaso
DITOMMASO LUBIN AUSTERMUEHLE, P.C.
17W220 22nd Street, Suite 410
Oakbrook Terrace, IL 60181
(630) 333-0000
psl@ditommasolaw.com
vdt@ditommasolaw.com
patustermuehle@ditommasolaw.com
jditommaso@ditommasolaw.com
eservice@ditommasolaw.com

LEVI & KORSINSKY, LLP

Nicholas I. Porritt
Adam M. Apton
1101 30th Street NW, Suite 115
Washington, DC 20007
Tel: (202) 524-4290
Fax: (202) 333-2121
Email: nporritt@zlk.com
Email: aapton@zlk.com
pro hac vice to be submitted

Attorneys for Movant